

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

CARPENTERS DISTRICT COUNCIL OF KANSAS CITY PENSION FUND, et al.,)	
)	
Plaintiffs,)	No. 12-1296-CV-S-BCW
v.)	
)	
DONCO CONSTRUCTION SERVICES, LLC,)	
)	
and)	
)	
DONCO 3 CONSTRUCTION, LLC,)	
)	
Defendants.)	

DEFENDANT DONCO CONSTRUCTION SERVICES, LLC'S EXHIBIT LIST

COMES NOW Defendant Donco Construction Services, LLC, by and through its attorneys of record, states that it designates the following exhibits that it may be offered into evidence at trial as follows:

1. Defendant's Exhibit 1: Letter from Donco Construction Services, LLC to Wilson-McShane Corporation, dated September 10, 2010. (Bates number 549)
2. Defendant's Exhibit 2: Carpenters District Council Meeting Minutes, dated September 22, 2010, 5 pages. (Bates numbers 385-389)
3. Defendant's Exhibit 3: Letter from Donco Construction Services, LLC to Wilson-McShane Corporation, dated September 27, 2010, 2 pages. (Bates numbers 5-6)
4. Defendant's Exhibit 4: Carpenters District Council Meeting Minutes, dated October 19, 2010, 4 pages. (Bates numbers 394-397)
5. Defendant's Exhibit 5: 2010 Vacation Fund Worksheet and attached checks to Donco Construction Services, LLC, dated December 23, 2010, 12 pages. (Bates numbers A00055-A00067)
6. Defendant's Exhibit 6: Carpenters District Council Meeting Minutes, dated February 17, 2011, 5 pages. (Bates numbers 408-412)

7. Defendant's Exhibit 7: Carpenters District Council Meeting Minutes, dated May 19, 2011, 5 pages. (Bates numbers 413-417)
8. Defendant's Exhibit 8: Check number 51610 from Donco Construction Services, LLC to Carpenter Fringe Benefit Program, dated August 4, 2011. (Bates number 21)
9. Defendant's Exhibit 9: Carpenters District Council Meeting Minutes, dated March 26, 2012, 4 pages. (Bates numbers 436-439)
10. Defendant's Exhibit 10: Letter from Paul Torlina to Donco Construction Services, LLC, dated May 7, 2012. (Bates number 48)
11. Defendant's Exhibit 11: CBAC Audit Comments regarding Donco Construction Services, LLC and attached worksheets and exception sheets, dated May 4, 2012, 14 pages. (Bates number 49-63)
12. Defendant's Exhibit 12: Letter from Paul Torlina to Donco Construction Services, LLC, dated May 16, 2012. (Bates number 64)
13. Defendant's Exhibit 13: CBAC Revised Audit Comments regarding Donco Construction Services, LLC and attached worksheets and exception sheets, dated May 16, 2012, 14 pages. (Bates numbers 65-79)
14. Defendant's Exhibit 14: Check number 54399 from Donco Construction Services, LLC to Carpenter Fringe Benefit Program, dated July 9, 2012. (Bates number 145)
15. Defendant's Exhibit 15: Email correspondence from Amy Rote to Paul Torlina, dated August 8, 2012, 2 pages. (Bates numbers 188-189)
16. Defendant's Exhibit 16: Letter from Paul Torlina to Wilson-McShane Corporation, dated August 16, 2012, enclosing check number 54514 from Donco Construction Services, LLC to Carpenter Fringe Benefit Program, dated August 9, 2012, 2 pages. (Bates numbers 85-86)
17. Defendant's Exhibit 17: Email correspondence from Paul Torlina to Bob Minutoli, dated August 16, 2012. (Bates number 214)
18. Defendant's Exhibit 18: Letter from Donco Construction Services, LLC to Paul Torlina, dated August 31, 2012, 3 pages. (Bates numbers 128-130)
19. Defendant's Exhibit 19: Email correspondence from Amy Rote to Paul Torlina, dated September 17, 2012. (Bates number 200)
20. Defendant's Exhibit 20: Carpenters District Council Meeting Minutes, dated September 28, 2012, 7 pages. (Bates numbers 453-459)

21. Defendant's Exhibit 21: Email correspondence from Amy Rote to Alisha York, dated September 19, 2012, 2 pages. (Bates numbers A00603-A00604)
22. Defendant's Exhibit 22: Email correspondence between Paul Torlina and Amy Rote, dated September 20, 2012. (Bates number 93)
23. Defendant's Exhibit 23: Check number 54603 from Donco Construction Services, LLC to Carpenter Fringe Benefit Program, dated September 20, 2012. (Bates number 2228)
24. Defendant's Exhibit 24: CBAC Audit Comments, Revision 3 regarding Donco Construction Services, LLC and attached worksheets and exception sheets, dated September 20, 2012, 13 pages.
25. Defendant's Exhibit 25: Check number 54621 from Donco Construction Services, LLC to Carpenter Fringe Benefit Program, dated October 1, 2012. (Bates number 2235)
26. Defendant's Exhibit 26: Check number 54671 from Donco Construction Services, LLC to Carpenter Fringe Benefit Program, dated October 15, 2012. (Bates number 2240)
27. Defendant's Exhibit 27: Carpenters District Council Meeting Minutes, dated November 9, 2012, 4 pages. (Bates numbers 460-463)
28. Defendant's Exhibit 28: CBAC Audit Comments, Revision 4 regarding Donco Construction Services, LLC and attached worksheets and exception sheets, dated December 4, 2012, 14 pages. (Bates numbers A00291-A00304)
29. Defendant's Exhibit 29: Audit Procedures from Auditor's file, 19 pages. (Bates numbers A00556-A00575)
30. Defendant's Exhibit 30: Correspondence from CBAC to Paul Torlina, dated January 31, 2013, 19 pages. (Bates numbers 220-239)
31. Defendant's Exhibit 31: Check Number 54726 from Donco Construction Services, LLC to Carpenter Fringe Benefit Program, dated March 5, 2013.
32. Defendant's Exhibit 32: Carpenters District Council Meeting Minutes, dated April 5, 2013, 4 pages. (Bates numbers 473-476)
33. Defendant's Exhibit 33: Summaries, lists, and demonstrative evidence.
34. Defendant's Exhibit 34: All documents listed on Plaintiffs' Exhibit List.
35. Defendant's Exhibit 35: All documents listed on Defendant Donco 3 Construction, LLC's Exhibit List.
36. Defendant's Exhibit 36: All documents necessary for rebuttal.

37. Defendant's Exhibit 37: All pleadings.
38. Defendant's Exhibit 38: All discovery responses by Plaintiffs and Defendants.
39. Defendant's Exhibit 39: All documents produced or identified by Plaintiffs and Defendants during discovery.

ELLIS, ELLIS, HAMMONS & JOHNSON, P.C.

By: /s/ Nicole L. Hutson

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served electronically to those parties who have entered an appearance in the court's Electronic Court Filing (ECF) System, upon the attorneys of record for each party to this action on this 2nd day of November, 2015, to-wit:

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